

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALLCO RENEWABLE ENERGY
LIMITED,

Plaintiff,

Case No. 1:15-cv-13515-PBS

v.

MASSACHUSETTS ELECTRIC
COMPANY D/B/A NATIONAL GRID, and
ANGELA O'CONNOR, JOLETTE
WESTBROOK and ROBERT HAYDEN, in
their official capacity as Commissioners of
the Massachusetts Department of Public
Utilities, and JUDITH JUDSON, in her
official capacity as Commissioner of the
Massachusetts Department of Energy
Resources,

Defendants.

**ALLCO RENEWABLE ENERGY LIMITED'S
MOTION FOR FURTHER RELIEF AND NOTICE OF ADDITIONAL AUTHORITY**

Pursuant to Local Rule 7.1(b)(3), Plaintiff Allco Renewable Energy Limited ("Allco"), by and through its counsel, respectfully provides notice of additional authority of the Federal Energy Regulatory Commission's order in *Windham Solar LLC*, 157 FERC ¶61,134 (November 22, 2016) which specifies minimum contract terms, and respectfully moves this Court for the following additional relief under 16 U.S.C. § 824a-3(h)(2)(B) in order to alleviate the continuing irreparable harm being suffered by Allco.

This Court has already held that the State Defendants acted unlawfully, and that Allco has no adequate remedy at law to compensate for the damage that Allco has suffered since 2011. Under 16 U.S.C. § 824a-3(h)(2)(B) Congress authorized this Court to "issue such injunctive or other relief as may be appropriate," when faced with the circumstances of this case.

More than four months after this Court's order invalidating the State Defendants' rule denying Allco its rights under federal law, the State Defendants have taken no action to address

2/21/17
Denied
PMB/sjcs